

New Title I A Coordinators' Cadre

October 18, 2017



Introductions & Logistics

- ❑ To submit a question during the call, send an email to natasha.napier@education.ky.gov.
- ❑ The webinar will be recorded and posted on the Title I web page.
- ❑ Responses to any follow-up questions will be emailed after the webinar.



Agenda for the Call

- ☐ REAP/RLIS
- ☐ Supplement, Not Supplant
- ☐ GMAP Narratives: District Set-Asides
- ☐ Resources



Comparability Report Reminder

- ❑ Districts are required to annually submit supporting documentation that establishes each district has provided comparable services to each of its schools using general funds.
- ❑ Due by November 1, 2017 for approval in GMAP
- ❑ Step-by-step instructions for completing and submitting the report in GMAP can be found on the [Title I, Part A web page](#) and [September's cadre webinar](#) showcased a tutorial for completing the report



TITLE V: RURAL EDUCATION ACHIEVEMENT PROGRAMS (REAP)

- ❑ Provides flexibility and resources to help rural schools and districts use federal grant resources more effectively
- ❑ There are basically two REAP programs:
 - ❑ Small Rural School Achievement Program (SRSA) and
 - ❑ Rural Low-Income Schools Program



What is RLIS?

- ❑ The RLIS Program authorizes formula grant awards to states, which in turn make sub grants to eligible LEAs.
- ❑ Kentucky is one of the leading states for rural districts making us one of the largest grantees.



2017-2018 RLIS PARTICIPATION IN KENTUCKY

- ❑ At least 113 eligible LEAs in the state
- ❑ This is a result of this year's dual eligibility with SRSA. *NEW*
- ❑ Thirteen districts have been eligible for either grant this year.



USE OF FUNDS

- ❑ Teacher professional development
- ❑ Support educational technology, including software and hardware
- ❑ Parent and family engagement activities
- ❑ Activities authorized under Title I, Part A
- ❑ Activities authorized under Language Instruction for Limited English Proficient and Immigrant Students (Title III)
- ❑ Can no longer be used for teacher recruitment and retention



ELIGIBILITY

❑ An LEA is eligible if...

- ❑ 20% or more of children ages 5-17 years served by the LEA are from families with incomes below the poverty line
- ❑ All of the schools served by the LEA are designated as rural with the correct locale code established by the Bureau of Educational Statistics. *NEW CODES THIS YEAR*
- ❑ This year, Kentucky's thirteen eligible SRSA districts are dual eligible for either SRSA or RLIS. *NEW*



LEA RESPONSIBILITIES

- ❑ The local education agency (LEA) is responsible for using Title V, Part B.
- ❑ Supplement non-federal funds, not supplant
- ❑ Keep accurate records required for fiscal audit and program evaluation
- ❑ Repayment of RLIS funds in the event of audit exception
- ❑ Comply with REAP legislation and non-regulatory guidance selected to best assist the district in raising student achievement and quality of instruction in providing a well-rounded education



What is Supplement, not Supplant?

- ❑ One of 3 fiscal tests in Title I, Part A
- ❑ Designed to ensure that Title I funds are not used to provide services that would, in the absence of those Title I dollars, be supported with state or local resources
 - ❑ Title I, Part A funds should *add to* (supplement) not *replace* (supplant) state and local funds.
- ❑ Main question of supplanting analysis:
 - ❑ *What would have happened in the absence of federal funds?*



3 Supplement, Not Supplant Presumptions

- ❑ An LEA used Title I funds to provide services that the LEA provided with nonfederal funds in the prior year.
- ❑ An LEA used Title I funds to provide services that the LEA was required to make available under federal, state, or local law.
- ❑ An LEA used Title I funds to provide services for children participating in a Title I program that the LEA provided with nonfederal funds to children not participating in Title I.



What Changed with ESSA?

- ❑ Technically, the supplement not supplant rule did not change, however the way in which an LEA must demonstrate compliance has shifted.
- ❑ Compliance has shifted from a focus on an analysis of individual Title I costs or services to a methodology of allocating state and local funds to participating Title I schools.



What Changed with ESSA?

- ❑ If the LEA/SEA can demonstrate that it is not replacing its state/local funding with federal dollars, the supplanting requirement is satisfied.

- ❑ Title I spending must still meet other spending rules:
 - ❑ School Eligibility
 - ❑ Student Eligibility
 - ❑ Consistency with the purpose of Title I
 - ❑ Federal Cost Principles



Demonstrating Compliance

A local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving Title I funds.

-ESSA 1118(b)(2)



What is Methodology?

- ❑ Methodology refers to the *manner in which an LEA distributes state and local funds to schools.*
 - ❑ Look at how the district allocates state and local funds to schools rather than how a school spends funds.
 - ❑ Ensure that the methodology does not account for Title I funds the school will receive.
 - ❑ The LEA does not base how to distribute state and local funds based on the Title I funds a school will receive.



What is Methodology?

- ❑ The LEA is not required to use the same methodology for each school.
- ❑ Compliant distribution methodology could vary based on:
 - ❑ Grade-span
 - ❑ School size
 - ❑ Student needs
 - ❑ School model
 - ❑ Other factors, not based on Title I status



What's the Effect on Spending?

- ❑ Provides more flexibility for schools to utilize Title I funds
- ❑ Encourages the use of Title I funds for comprehensive and innovative programs for Title I students
 - ❑ Title I funds may be used to support activities identified in the comprehensive needs assessment and articulated in the comprehensive schoolwide plan.



Possible Method of Evaluation

- ❑ Examine how the LEA distributes state and local funds/resources to schools.
- ❑ Verify the distribution method does not take away from state and local funds/resources from Title I schools because they participate in the program.
- ❑ Verify the LEA followed its distribution process so that Title I schools received all of the state and local funds/resources they would have received if not participating in Title I.



Possible Information Inventory

- ❑ How do LEAs in the state distribute state and local funds (and /or state- and locally-funded resources) to schools?
 - ❑ Are funds/resources distributed based on the following:
 - ❑ Positions in the school (student/teacher ratio),
 - ❑ A weighted student funding formula, or
 - ❑ A combination of approaches
- ❑ How do LEAs currently document how they distribute state and local funds/resources to schools?



Simple Example in a School of 450 Students

□ Assume:

- 1 teacher per 22 students (\$65,000/teacher)
- 1 principal per school (\$120,000)
- 1 librarian per school (\$65,000)
- 2 guidance counselors/school (\$65,000)
- \$825/student for instructional materials and supplies (including technology)

Category	Calculation	Amount
1 principal	1 x \$120,000	\$120,000
1 librarian	1 x \$65,000	\$65,000
2 guidance counselors	2 x \$65,000	\$130,000
21 teachers	21 x \$65,000	\$1,365,000
Materials and supplies	450 x \$825	\$371,250
		TOTAL: \$2,051,250



Requirements for Compliance

- ❑ The LEA must document the methodology for distributing state and local funds.
 - ❑ **Deadline:** December 10, 2017
 - ❑ The federal government is not permitted to prescribe the specific methodology an LEA uses to allocate its state and local funds to each school. ESSA 1118(b)(4)
 - ❑ Currently there are no federal regulations or federal guidance regarding the revised SNS test.
 - ❑ Methodology documentation must be in place in the event of monitoring.



District Set-Aside Narratives

- ❑ For every district set-aside category that contains budgeted funds, a justification must be provided and include the following details:
 - ❑ a description of the goals and purposes of the set-aside and
 - ❑ a list of the schools to be impacted.



GMAP: Other District Set-Asides



When using the *Other District Set-Asides* option in GMAP, districts must complete the following:

1. Notify the assigned Title I, Part A consultant via email to obtain prior permission **AND**
2. Submit a narrative in GMAP after securing permission.

Resources

- ❑ *GMAP Help for Current Pages*
- ❑ [Title I Handbook](#)
- ❑ [Title I Fiscal Guidance](#) (ED, Feb. 2008)
- ❑ [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program](#) (ED, July 2015)
Specifically pages 8-12
- ❑ [Senate Report 114-231, p. 35 – Every Child Achieves Act of 2015](#) (114th Congress, 2nd Session)
- ❑ [20 U.S.C. § 6321 Fiscal Requirements](#)



Next Month's Call

- ❑ Title I Coordinator's *Year-at-a-Glance Calendar*
- ❑ And more to be announced...
- ❑ November 15th 10:00 – 11:00 Eastern Time
- ❑ Email feedback and suggestions for future calls to title1reports@education.ky.gov



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